

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION**

ALLISON SCHULTZ, individually, and  
on behalf of all others similarly situated.,

Plaintiff,

v.

Case No. 5:23-cv-00030-KDB-SCR

PLANET AUTOMOTIVE GROUP, LLC., *et al.*

Defendants.

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**CONSENT MOTION FOR EXTENSION OF TIME FOR  
DEFENDANT HELM TECHNOLOGIES, LLC TO RESPOND TO  
SECOND AMENDED CLASS ACTION COMPLAINT**

Defendant Helm Technologies, LLC (“Defendant”), with the consent of Plaintiff, and in accordance with Local Rule 7.1, respectfully moves for a 30-day extension of time until and including January 11, 2024, to move, plead, or otherwise respond to the Second Amended Class Action Complaint (the “Complaint”). The reasons in support of this Consent Motion are as follows:

1. Defendant was served with the Summons and Complaint on or about November 21, 2023.
2. The undersigned counsel was not asked to represent Helm Technologies, LLC until on or about December 11, 2023. The undersigned counsel requires additional time to understand the underlying facts and law, and to respond appropriately to the Complaint.
3. The additional time will also afford counsel for Plaintiffs, Defendant, and the other parties to the lawsuit a better opportunity to discuss a possible early resolution of this matter.
4. Plaintiff’s counsel, Christopher E. Roberts, has consented to the requested extension of time.

5. This Consent Motion is not intended to cause unnecessary delay and is not filed for any other improper purpose. Indeed, Defendant has previously been very responsive to third-party discovery requests from Plaintiff, and has already provided a substantial number of documents to Plaintiff, which should help accelerate the discovery process in this matter if additional discovery proves necessary.

WHEREFORE, Defendant Helm Technologies, LLC respectfully moves for an extension of time until and including January 11, 2024, to move, plead, or otherwise respond to the Second Amended Class Action Complaint.

Respectfully submitted,

CLARK HILL PLC

By: /s/ Christopher B. Clare  
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Dated: December 13, 2023

## CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2023, I electronically filed the above with the Clerk of Court using the CM/ECF System, which will provide electronic copies to counsel of record.

s/ Christopher B. Clare